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2004 SEP 27 P 12:22

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS AT WORCESTER
DISTRICT OF MASS.

CHERYL A. MONTANARI
Plaintiff,

vs.

BLAIRE HOUSE OF MILFORD;
ESSEX GROUP MANAGEMENT CORP.,
THOMAS SULLIVAN, alias; and
MAUREEN GULINO, alias,
Defendants

C.A. No. 04-40012-NMG

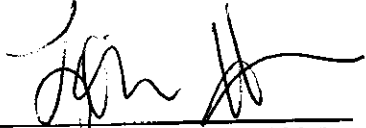
JOINT MOTION TO AMEND COMPLAINT AND REMAND TO STATE COURT


Now come the parties in the above-cited matter and do hereby move this Honorable Court pursuant to Federal Rule of Civil Procedure 15(a) for leave to amend Plaintiff's Complaint and remand to state court in the form annexed hereto and as grounds therefor and in support thereof states that the purpose of the amendment is to withdraw all federal claims alleged in Plaintiff's Complaint dated December 22, 2003.

WHEREFORE, the parties respectfully pray that their Joint Motion to Amend Complaint and Remand be granted.

PLAINTIFF,
By her attorneys,
SINAPI, FORMISANO & CO., LTD.

DEFENDANTS,
By their attorneys,
CARTER & DOYLE LLP


Louise A. Herman (#548995)
100 Midway Place, Suite 1
Cranston, RI 02920-5707
(401) 944-9690


Valerie S. Carter, Esq. (#545412)
530 Atlantic Avenue
Boston, MA 02210
(617) 348-0525

Dated: September 3, 2004